

THE HONORABLE BENJAMIN SETTLE
THE HONORABLE DAVID W. CHRISTEL

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

JESUS CHAVEZ FLORES,

Plaintiff,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT; THOMAS D.
HOMAN, Deputy Director and Senior Official
Performing the Duties of the Director of the U.S.
Immigration and Customs Enforcement; MARC J.
MOORE, Director of the Seattle Field Office of
U.S. Customs Enforcement; BRYAN WILCOX,
Deputy Director of the Seattle Field Office of U.S.
Immigration and Customs Enforcement;
WILLIAM PENALOZA, Assistant Field Office
Director, Detention, Seattle Field Office of U.S.
Immigration and Customs Enforcement; DREW
BOSTOCK, Assistant Field Office Director,
Seattle Field Office of U.S. Immigration and
Customs Enforcement; ICE DOES 1-10; THE
GEO GROUP, INC., a Florida corporation;
LOWELL CLARK, Warden, Northwest Detention
Center; WILLIAM MCHATTON, Associate
Warden, Northwest Detention Center; MICHAEL
BEARDSLEY, Officer, Northwest Detention
Center; LEROY PORTILLO, Captain, Northwest
Detention Center; GEO DOES 1-10,

Defendants

Case No.: 3:18-cv-05139-BHS-DWC

AMENDED DECLARATION OF JOAN
K. MELL

NOTED FOR: OCTOBER 12, 2018

1 I, Joan K. Mell, declare and state the following under oath subject to penalty of perjury
2 pursuant to the laws of the State of Washington:

3
4 1. I am the attorney for The GEO Group, Inc. and individually named employees in the
5 above-entitled action. I am over the age of 18 and competent to testify to the matters set forth
6 in my declaration.

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8 2. On September 7, 2018, I conferred with counsel about sealing the video and
9 substituting the still images with redactions.

10 3. Ms. Eunice Cho objected on waiver grounds. Ms. Morehead was supporting ICE's
11 request and has no objections.

12
13 4. Attached at **Exhibit A** are true and correct copies of the proposed still shots with
14 redactions to be substituted for the unreacted still shots.

15 DATED this 2nd day of October, 2018 at Fircrest, WA.

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18 _____
19 Joan K. Mell, WSBA No. 21319
20 Attorney for The GEO Group, Inc.

CERTIFICATE OF SERVICE

I, Joseph Fonseca, hereby certify as follows:

I am over the age of 18, a resident of Pierce County, and not a party to the above action.

On October 2, 2018, I electronically filed the above Amended Declaration of Joan K. Mell, with the Clerk of the Court using the CM/ECF system and served via the CM/ECF E-Service system and E-Mail to the following:

Emily Chiang, WSBA No. 50517
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1 I certify under penalty of perjury under the laws of the State of Washington that the above
2 information is true and correct.

3
4 DATED this 2nd day of October, 2018 at Fircrest, Washington.

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6 _____
7 Joseph Fonseca, Paralegal
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